

REMARKS/ARGUMENTS

Pending claims 1, 3-11, 13-21 and 23-25 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,157,905 (Powell) and further in view of U.S. Patent No. 6,718,519 (Taieb). Applicant respectfully traverses the rejection and respectfully requests reconsideration thereof.

As to claim 1, there is no motivation to combine Powell and Taieb. In this regard, Powell is directed to statistical text analysis (Powell, col. 1, lns. 5-10). In contrast, Taieb is directed to displaying multiple language documents. The conversions of characters into 2D or 3D characterizations done in Powell are merely used to map a document to determine a language in which the document was created. *E.g.*, Powell, col. 11, lns. 62-67. Powell teaches no other use for the converted 2D and 3D characterizations. Taieb, on the other hand, is directed to displaying multilingual texts. However, Taieb nowhere teaches or suggests use of conversions of characters to different code formats based on a type of the character.

The combining of Powell and Taieb proposed by the Office Action would make no sense, and would not meet the recited subject matter of claim 1. That is, even if the 2D and 3D characterizations generated in Powell were displayed using the teaching of Taieb, no display of characters would result as recited by claim 1. Instead, a statistical 2D or 3D characterization would appear—not characters.

Nor is there any teaching or suggestion in either reference to combine them. Accordingly, a *prima facie* case of obviousness has not been established and claims 1 and 3-9 are patentable. MPEP §2142; 2143. For at least the same reasons, claims 11 and 13-21 and 23-25 are patentable.

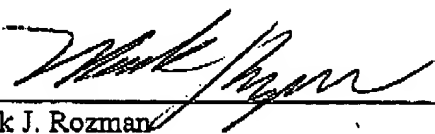
Furthermore, the proposed combination would render the prior art unsatisfactory for its intended purpose. Accordingly, no suggestion or motivation can exist to make the proposed modification. MPEP 2143.01. In this regard, displaying the 2D and 3D characterizations of Powell based on the teaching in Taieb would frustrate the intended purpose of Powell, namely to perform statistical analysis to identify a language and character set. There is absolutely no reason to display the characterizations in the system of Powell. Even if displayed, the characterizations would not cause the display of the characters of the file as recited by the claims. Accordingly, for this further reason the above claims are patentable over the proposed combination.

For at least the same reasons discussed above, the rejection of claims 2, 12 and 24 over Powell and Taieb and in further view of U.S. Patent No. 6,397,259 (Lincke) is also overcome.

The application is believed to be in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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